

Code of Conduct

The **Code of Conduct (CoC)** contains the fundamental principles and rules for the conduct of all **Inventronics employees**. It defines the ethical and legal framework within which we act. The CoC applies to all employees worldwide, both in their dealings with each other and in their relationships with our external partners and the general public.

Contacts and validity

Issuer:	A. Garzieri (QM)
Process Owner:	Jan Karrass (Chief Compliance Officer)
Process Expert:	Percy Jia, Nana Li
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Management Board
Manager all
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CONTENT

1. APPLICABILITY OF THIS CODE OF CONDUCT	3
2. OUR COMMITMENT TO INTEGRITY	4
3. OUR RESPONSIBILITY FOR COMPLIANCE & ETHICS	4
4. OUR RESPONSIBILITY TO EACH OTHER AND AS MEMBERS OF SOCIETY	4
4.1 Diversity, Respect and Fairness in the Workplace	4
5. ENVIRONMENT, HEALTH & SAFETY	5
5.1 Sustainability & Social Engagement	5
6. OUR RESPONSIBILITY FOR OUR BUSINESS	5
6.1 Product Quality, Product Safety and Product Compliance	5
6.2 Protecting Our Company's Confidential Information & Intellectual Property	6
6.3 Internal Records and Financial Integrity	6
6.4 Privacy and Protection of Personal Information	6
6.5 IT and Information Security	7
7. OUR RESPONSIBILITY AS A BUSINESS PARTNER	7
7.1 Conflict of Interests	7
7.2 Gifts and Hospitality	7
7.3 Prohibition of Bribery and Corruption	8
7.4 Donations and Sponsoring	8
7.5 Prohibition of Money Laundering and Terrorism Financing	9
7.6 Fair Competition	9
7.7 Export Control and Trade Compliance	9
7.8 Working with Suppliers	10
7.9 Protecting Proprietary Information of Third Parties and Insider Trading	10
8. LIVING THIS CODE OF CONDUCT	11
8.1 Making the Right Decision	11
8.2 How to Raise Concerns and Report Violations	11
8.3 Contact Details and Reporting Channels	11

Dear Colleagues -

The Code of Conduct (CoC) contains the fundamental principles and rules for the conduct of all Inventronics employees. It defines the ethical and legal framework within which we act. With this Code of Conduct, we reaffirm and promote our commitment to honesty, integrity and mutual trust in the relationships we engage. We reinforce and strengthen the awareness of the law and ethics as an integral part of our business activities.

Our Code of Conduct assists us in conducting our business in a legal and ethical manner, by highlighting potential areas of risk and conflict. It also instructs us on how to obtain support in case of doubt, and how to raise concerns about potential illegal or unethical behavior.

We count on you to live up to our values, working together with us to promote and sustain the compliance culture in our company.

Yours sincerely,

Signature 
Name: Guichao Hua
Chief Executive Officer

Signature 
Name: Meilan Huang
Human Resource Vice President



1. APPLICABILITY OF THIS CODE OF CONDUCT

The CoC applies to all employees, executives and board members, both in their dealings with each other and in their relationships with our external partners and the general public.

In certain areas, this Code is supplemented by additional policies that cover specific matters or processes in more detail.

2. OUR COMMITMENT TO INTEGRITY

Integrity is the basis of our work at Inventronics, it is how we conduct our business. No goal will ever be worth compromising our values and ethical standards. We keep our promises and stand by our agreements. We comply with applicable laws and regulations and commit ourselves to always act responsibly. We respect the dignity of all people, protect their safety and strive to conserve the environment.

3. OUR RESPONSIBILITY FOR COMPLIANCE & ETHICS

Compliance means to act in conformity with applicable rules. Ethical behavior means more than complying with applicable rules – but it starts there. Each of us acknowledges and acts upon the importance of knowing the laws, regulations and our company’s internal policies applicable to our particular jobs. Including, but not limited to, this Code of Conduct.

We are committed to a company culture where legal and ethical behavior is actively promoted. This includes speaking up and pointing out ways to improve as well as openly addressing areas of concern.

Managers and supervisors have a special responsibility for compliance and ethics. They must lead by example and are the first point of contact for any questions or uncertainties regarding this Code of Conduct. It is the responsibility of every manager or supervisor to

- ensure that those persons reporting to them are fully aware of our Code of Conduct, understand all of its requirements and have sufficient resources to comply with it;
- exemplify compliance and ethical behavior through leadership and their own actions (“walk the talk”);
- support all employees who raise concerns or report violations, ensuring that they will not suffer any kind of retaliation.

Anyone who violates our Code of Conduct must expect consequences. Depending on the kind and seriousness of the violation, these may range from internal disciplinary actions (up to and including dismissal) to claims for damages under civil law or even penalties under criminal law.

We also expect our business partners to share the values set out in our Code of Conduct and to comply with all applicable laws.

4. OUR RESPONSIBILITY TO EACH OTHER AND AS MEMBERS OF SOCIETY

4.1 DIVERSITY, RESPECT AND FAIRNESS IN THE WORKPLACE

At Inventronics, we take pride in the diversity of our global workforce. We believe that diversity enriches our business and is a key factor to innovation and long-term success. For that reason, our company seeks to actively recruit, continually develop and retain talented people with varied backgrounds and origins. We embrace and support diversity both in our workforce and leadership. We do not discriminate or tolerate discrimination against anyone based on gender, race, religion, age, disability, sexual orientation, nationality, political affiliations or union activity. As a matter of principle, employees are chosen, hired and promoted based on their potential, their qualifications and skills, as well as our company’s needs. All employees are treated with equal respect.



Moreover, each of us is expected to actively contribute to a working atmosphere characterized by respectful cooperation, mutual trust and fairness.

Any form of offensive behavior has no place in our company. We do not tolerate any kind of workplace harassment, including but not limited to unwanted sexual advances, immoral propositions and humiliation of any kind, such as through abusive or disrespectful jokes, comments or actions.

Fairness, to us, includes ensuring to our employees fair compensation and social benefits, and compliance with applicable labor laws and international standards on human rights. We reject at any phase of our production or processing all use of child labor, forced or compulsory labor as well as any kind of human rights violation. We respect our employees' right to form works councils, collective bargaining units or other forms of employee representation.

5. ENVIRONMENT, HEALTH & SAFETY

Inventronics cares about the environment. We not only comply with environmental laws, regulations and standards, but are also committed to limit the consumption of natural resources through adequate design of our products and processes.

In our day-to-day, each of us endeavors to mitigate the impact on the environment by using our resources and energy economically and efficiently. When operating our production facilities, we make our best efforts to keep the use of energy, raw materials and other resources to a minimum.

Everyone deserves to work on healthy and safe conditions. Ensuring such a work environment by complying with all health and occupational safety laws and regulations is of utmost importance to us at Inventronics.

Our company has effective safety programs in place, in particular for the safety of workers, emergency preparedness and exposure to dangerous substances and material.

We foster a company culture where we look after each other, where employees take care not only of their own safety but also of the safety of their colleagues.

All managers and supervisors are obliged to instruct and support their employees in meeting their respective safety responsibility and to equip their employees appropriately.

Using or being under the influence of alcohol or drugs is forbidden at Inventronics if this jeopardizes employees' ability to perform their work safely and properly.

5.1 SUSTAINABILITY & SOCIAL ENGAGEMENT

Making a positive impact on the future of mobility lighting while conducting our business passionately, connected and with integrity: This is not only our mission, but also the primary way through which our company fulfills its social responsibility.

By doing our business in a sustainable, fair and competent manner, Inventronics contributes to the communities where we live and work, to society in general and to the economy, through our products, innovation, jobs, business relationships, fiscal contributions and other ways.

We also promote sustainability by adhering to high ethical, social and environmental standards, as delineated in the other sections on this Code, as well as by making donations to charitable causes. When making donations on behalf of our company, we respect our internal policies and rules on charitable contributions to ensure their legitimacy and transparency.

6. OUR RESPONSIBILITY FOR OUR BUSINESS

6.1 PRODUCT QUALITY, PRODUCT SAFETY AND PRODUCT COMPLIANCE

Our products and services are at the very heart of our business. Ensuring their quality and safety is not only indispensable to the success of our customers and of our company, it is also



essential to protect the safety of our customers. Inventronics is therefore committed to ensure our products' quality, safety and compliance with all rules, regulations and standards applicable to them. This is not only our duty, but also our top priority.

We develop and execute all production processes with maximum care. We comply with all quality control standards that govern our responsibilities, across all our facilities and at all stages of the product life cycle. These control standards include not only all applicable laws and regulations but also customer specifications or standards and our company's internal control procedures to ensure product quality and safety.

We continuously monitor the quality, safety and compliance of our products and services through adequate processes and structures. We take our customers' feedback and any raised concerns regarding the quality or safety of our products very seriously and ensure that they are properly investigated and handled.

6.2 PROTECTING OUR COMPANY'S CONFIDENTIAL INFORMATION & INTELLECTUAL PROPERTY

Our business success relies in great part on our ability to maintain the confidentiality of information regarding our inventions, trade secrets and know-how, in order to secure a fair competitive advantage in the markets in which we operate.

Each of us recognizes our responsibility for safeguarding the confidentiality of our company's internal and proprietary information. We refrain from sharing non-public company information without prior authorization. This includes, but is not limited to, non-public details concerning our company's organization and processes, sales figures, prices, profit margins, marketing strategies and plans, customer and employee database, product development, manufacturing techniques, technical specifications, and research.

We protect our company's intellectual property against unauthorized access by third parties. Also, internally, only authorized persons may access confidential and other kind of restricted information. We acknowledge the importance of complying with internal guidelines and processes limiting access to or transmission of certain types of information.

We protect everything of value that our company owns, benefits from or has use of, particularly equipment, raw materials, products and production facilities (assets). We ensure that none of these assets, including scrap or drafts, is stolen, damaged, misused or improperly destroyed. We use our company's resources for business and not for personal purposes, unless personal use is authorized.

6.3 INTERNAL RECORDS AND FINANCIAL INTEGRITY

Our stakeholders, including our employees, customers, shareholders, business partners and public authorities, frequently receive and rely on information recorded and provided by our company. We ensure that this information is honest, accurate and reliable through the quality of our records, documentation and accounting. In particular, our financial records accurately, completely and fairly reflect our company's assets, liabilities, revenues and expenses.

We ensure that appropriate processes are in place to adequately and truthfully record and document all relevant aspects of our business activities, and we always comply with those processes. We comply with all laws and regulations pertaining the processing, recording and retention of information and documentation, including but not limited to financial and accounting laws.

6.4 PRIVACY AND PROTECTION OF PERSONAL INFORMATION

Our company and every one of us must comply with all applicable privacy and data protection laws. We do not collect, store, process or otherwise use personal data without either the

6/13

consent of the person involved, a contractual arrangement or some other proper legal basis. We do not use collected data for any other purposes beyond those for which we received authorization. We protect and under no circumstances share the personal data of employees, former employees, customers, suppliers and others without being authorized to do so. We comply with our company's data protection policies and, in the event of a personal data breach, we immediately report the event to allow appropriate measures to be taken.

6.5 IT AND INFORMATION SECURITY

Information technology (IT) – the use of computers and other hardware, software and networks to retrieve, produce, store, process and transmit data – is an integral part of our business. However, it involves numerous risks, including the impairment or loss of important data as a result of malware (viruses) and data misuse (e.g. by action of hackers). Our electronic communications systems, including e-mail, intranet and internet, are meant to be used for company business.

We recognize that unencrypted data exchange (e.g. USB stick) is not a secure means of communication and therefore exercise caution when dealing with sensitive data. We are attentive when receiving e-mails from unknown sources or suspicious messages from supposedly known, but not verified, sources. We refrain from opening or downloading attachments when the message or sender appears untrustworthy.

7. OUR RESPONSIBILITY AS A BUSINESS PARTNER

7.1 CONFLICT OF INTERESTS

At Inventronics, we are loyal and always act in the best interests of our company and our customers when making business decisions. We avoid conflicts of interests and never use our position or company assets for personal gain.

Conflicts of interests arise when our personal interests potentially interfere with our work at Inventronics or with our ability to make objective decisions on behalf of our company. Conflicts of interests may result from personal, family or financial ties with suppliers and business partners.

We avoid all situations that present (or create the appearance of) a conflict between our personal interests and the business interests of Inventronics. Personal interests or the interests of third parties, such as relatives or friends, may not be considered when reaching decisions on behalf of Inventronics.

We discuss any apparent or actual conflicts of interests in due time with our supervisors and the responsible HR organization, to permit a solution that protects our company's interests. We seek prior clearance from Inventronics when interested in engaging in sideline work. We understand that authorization may be denied if detrimental to the interests of our company.

7.2 GIFTS AND HOSPITALITY

Gifts and invitations to external business partners, such as to lunch or dinner, can help build trust and promote good business relationships. In some countries, they form an integral part of common business practice. But they can also create conflicts of interests or suggest something improper.

The gifts and invitations we give and receive must be appropriate to the occasion, infrequent, and reasonable in value (not lavish or extravagant). They must be in line with ordinary local business customs and applicable laws. And they may never be offered or received in exchange for an improper advantage.

Prior approval by the Chief Compliance Officer is required for providing the following benefits to third parties:

- benefits (including invitations) to public officials;

- invitations to entertainment events and/or payment of travel and/or accommodation expenses in excess of the *Invitation Allowance*¹, invitations from a partner or if an invitation has otherwise been extended to this person within the last six months;
- meal invitations, gifts and similar benefits worth more than the *Gift Allowance*²;
- monetary gifts (including monetary equivalents such as vouchers and checks).

Please note local instructions and guideline may provide for more detailed requirements regarding the above. Before accepting gifts or invitations, the receiving employee must verify that the benefit in question is compliant with all general anti-corruption principles established in the Compliance Guideline. For gifts of money (including money equivalents) prior approval from the Chief Compliance Officer is necessary.

7.3 PROHIBITION OF BRIBERY AND CORRUPTION

Bribery is the offering, giving, receiving and soliciting of anything of value in exchange for some kind of influence or action.

Bribes can take many forms, such as secret commissions or kickbacks, paid entertainment and trips, sweetheart deals, illegitimate charitable contributions, excessive or unjustified sponsoring, campaign contributions, higher paying job offers, the hiring of a relative or friend, and many others.

Our company does not tolerate any form of bribery or corruption. We win business on the merits of our products and not by bribing decisionmakers of potential customers. We also choose our suppliers of goods and services and other business partners based on appropriate business reasons.

We never offer or give anything to obtain a business advantage, or that could appear to have this objective. We exercise care when selecting business partners and never ignore signs that they may be engaging in illegal or unethical activities.

We conduct our business activities in accordance with all applicable anti-bribery and anti-corruption laws.

7.4 DONATIONS AND SPONSORING

Improper or excessive donations and sponsoring could be seen as a form of bribery or corruption and therefore could cause serious harm – to Inventronics, to the recipient of the contribution, and to the individuals involved. Only authorized employees can make donations on behalf of our company, in accordance with our internal policies.

We only grant donations or sponsorships in a transparent manner, when the recipient of the contribution, its purpose and the receipt is documented and verifiable.

We donate on a voluntary basis without demanding anything in return. Donations can only be made to recognized non-profit organizations whose goals are compatible with Inventronics's principles and may never be paid to private accounts.

Sponsorship contributions are used to promote our company's reputation and brand. They must be commensurate with the consideration offered in exchange (opportunity to advertise Inventronics's products or brand), have legitimate business purposes and be based on written agreement. We do not sponsor events organized by individuals or organizations with goals incompatible with our principles.

Financial contributions to political parties, their members or candidates are not allowed.

¹ As to the Invitation Allowance please refer to the Annex to this Code of Conduct.

² As to the Gift Allowance please refer to the Annex to this Code of Conduct.

7.5 PROHIBITION OF MONEY LAUNDERING AND TERRORISM FINANCING

Money laundering is the process through which criminals and terrorists move funds gained from illegal activities through apparently legitimate businesses, in order to make those funds appear legitimate or to disguise its origin.

At Inventronics, we implement and comply with policies and processes designed to mitigate and prevent the risk of money laundering and terrorist financing. We follow procedures and internal controls to support compliance with anti-money laundering regulations.

Our commitment is to only deal with business partners who do legal businesses and whose funds are derived from legal sources. Our company must not be misused for money laundering purposes.

All employees are required to strictly comply with anti-money laundering laws and to use the company's internal procedures designed to detect and prevent suspicious forms of payment that may indicate money laundering. To avoid problems in this area, the attention of all employees is required to report suspicious behavior by customers, consultants and business partners. In addition, employees are required to use good judgment and pay close attention to who is behind every transaction and comply with all applicable accounting, record-keeping, as well as financial reporting rules and requirements applicable to cash and payments in connection with business transactions and contracts.

7.6 FAIR COMPETITION

Competition and antitrust laws benefit markets and all market players, by ensuring that businesses compete based on quality and price. We at Inventronics are committed to free and fair competition.

We compete, with integrity, on the merits of our products. And we abide by all antitrust and competition laws.

Antitrust violations may have serious consequences for the employees involved and our company. Fines and penalties are substantial, amounting to up to ten percent of our entire global turnover. In some jurisdictions, violations of antitrust laws are also criminal offences punishable with prison sentences for those involved. In addition, antitrust violations can substantially damage Inventronics's reputation.

We do not communicate with competitors about matters such as prices, costs, capacities, discounts, profits, profit margins, customers, suppliers, sales terms and conditions, methods of distribution, expansion plans, or any other matter that could create the appearance of improper agreements or understandings.

We do not make agreements or reach understandings with a competitor regarding our customers, markets, territories, suppliers or distributors.

We do not force distributors and other purchasers to sell our products at a particular price.

We do not gather information about our competitors via deception, theft, misrepresentation, or other illegal or unethical means.

Special caution is required at trade association meetings and other industry gatherings. Even jokes and innuendo about inappropriate topics are dangerous as they could be misinterpreted and misreported.

7.7 EXPORT CONTROL AND TRADE COMPLIANCE

As a global company, Inventronics exports and imports products around the world. Export controls and economic sanctions impose limitations on where and with whom we can do business, and those limitations must be observed each time such a transaction takes place. Failure to



comply with export and trade restrictions may lead to substantial civil and criminal penalties both for our company and for the individuals involved.

We comply with all provisions for importing and exporting goods, services and information.

We comply with economic and trade sanction regimes, embargoes against certain countries, companies or individuals and with prohibitions of certain types of exports and imports.

We ensure adequate control over our business partners as their actions may be attributed to our company. This applies in particular to our customers and sales intermediaries.

Export controls may also apply to transfers of software, data, and technological know-how via email, cloud, telephone, fax, or shared drives. Even the temporary cross-border transfer of, for example, technical drawings taken on a business trip may fall under export control. We seek advice when in doubt on how trade laws apply to our jobs and responsibilities.

7.8 WORKING WITH SUPPLIERS

When selecting suppliers, we decide based on objective criteria and functional assessment of suppliers and are guided by the best interests of our company.

We are committed to ensure open competition when selecting suppliers and negotiating contracts. We involve the Procurement department in accordance to internal policies, to ensure transparent and compliant supplier awarding.

We ensure that suppliers share our ethical values and comply with all applicable laws. In particular, we expect our suppliers to, at a minimum:

- prohibit corruption;
- engage in fair competition;
- respect the human and labor rights of their employees;
- ban child and forced labor;
- ensure health and safety at the workplace;
- respect environmental laws and standards;
- promote compliance among their suppliers.

7.9 PROTECTING PROPRIETARY INFORMATION OF THIRD PARTIES AND INSIDER TRADING

Just as we value and safeguard our company's confidential and proprietary information, we also recognize the importance of respecting and maintaining the confidentiality of sensitive or proprietary information of third parties, especially our customers, suppliers, shareholders or other business partners. This is essential to build trustful relationships on which the success of our business depends on.

We ensure that appropriate licenses or permissions are obtained before making use of proprietary information of any business partner. We also do not utilize trademarks of our customers and do not publish cooperation with them without their prior written consent.

In the course of our work, we may have access to confidential information that, once public, could have a relevant impact in the price of shares and other securities issued by our shareholders, customers or other business partners. We absolutely refrain from purchasing or selling shares or other securities based on such non-public information, as well as to pass on non-public information to someone who could engage in this behavior ("tipping"). We do not disclose inside information nor make it available to a third party unless duly authorized to do so.

8. LIVING THIS CODE OF CONDUCT

8.1 MAKING THE RIGHT DECISION

Our Code of Conduct is binding for all of us at Inventronics, employees, executives and board members worldwide.

If you are confronted with a situation for which our Code of Conduct does not provide guidance, the following questions can assist you in making the right decision:

- Does the situation involve an action that you think might be illegal, unethical or unfair?
- Would the situation embarrass our company or otherwise harm its reputation if it became publicly known?
- Would you feel uncomfortable or embarrassed telling your families or friends about the situation?

If you answered “yes” or “possibly” to any of the questions above, you should seek support before proceeding.

Your first point of contact for any questions or uncertainties regarding this Code of Conduct is generally your line manager or, if the situation requires, the line manager of your manager.

Additionally, if you prefer, you can always seek the support of your local HR business partner or contact the Compliance department, including the Chief Compliance Officer, for further guidance (see section “Contact Information”).

8.2 HOW TO RAISE CONCERNS AND REPORT VIOLATIONS

All of us at Inventronics are encouraged to report situations that may violate this Code of Conduct or any applicable laws. If you become aware of or suspect any legal or ethical violation within our global company or involving a business partner, please report it to our Compliance department or directly to the Chief Compliance Officer (see section “Contact Information”). You may raise concerns or report suspected violations in person, by e-mail, telephone or letter, as you prefer.

Our company is committed to investigate all reported violations and to treat all the persons involved fairly. We are committed to handle reports and investigations with appropriate care and sensitivity and in a discrete manner. All of us at Inventronics are required to cooperate openly and truthfully during investigations concerning possible illegal or unethical behavior.

Anyone who seeks advice, raises a concern, reports misconduct or provides information in an investigation does not need to fear personal or professional disadvantages for so doing. At Inventronics, we do not tolerate any form of improper behavior against those supporting our compliance efforts in good faith.

8.3 CONTACT DETAILS AND REPORTING CHANNELS

The compliance function within Inventronics Group is led by our Chief Compliance Officer. You may reach him or the compliance department by using the following contact details.

Compliance Department	
E-mail	compliance@inventronicsglobal.com
Chief Compliance Officer	Mr. Jan Karrass (he/him)
E-mail	jan.karrass@inventronicsglobal.com

Address:**Inventronics GmbH, Parkring 31-33, 85748 Garching, Germany**

In addition to aforementioned internal channels, we have appointed an external ombudsperson to whom employees and business partners can turn confidentially and anonymously.

The ombudsperson receives tips on possible violations of laws or internal rules (whistleblower system). He is also responsible for the complaints procedure under the German Supply Chain Due Diligence Act. The complaints procedure enables individuals to point out human rights and environmental risks as well as violations of human rights or environmental obligations.

The Ombudsperson being an independent attorney-at-law can be reached as follows:

Ombudsperson	
Ombudsperson	Mr. Dr. Carsten Thiel von Herff, LL.M. (he/him)
E-mail	ombudsmann@thielvonherff.de
Address	Loebellstr. 4, 33602 Bielefeld, Germany
Phone	+49 521 557 333 0
Mobile	+49 151 58230321
Homepage	www.thielvonherff.de
Reporting platform	www.report-tvh.com

Since Inventronics is a globally active company, the Ombudsman is able to handle requests in a broad variety of languages.

Anyone who provides a tip in good faith is protected. All tips will be followed up with the utmost care and with due regard for the rights of all parties involved.

Invitation and Gift Allowance

Country/Region	Invitation Allowance	Gift Allowance
China	100 USD	50 USD
USA	100 USD	50 USD
Europe	100 EUR	50 EUR
India	6.500 INR	2.000 INR
Rest of World	100 USD	50 USD